

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

SEALED PLAINTIFF 1 and	)	
SEALED PLAINTIFF 2,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 3:22-cv-00670
	)	
PATRIOT FRONT, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**  
**FOR DEFENDANT JOHN DOE 1**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs and Defendant John Doe 1, by and through their undersigned counsel, hereby stipulate that all claims asserted against Defendant John Doe 1, and any defenses he might have asserted, are dismissed with prejudice. This stipulation of dismissal does not affect Plaintiffs' claims against the remaining defendants who have not previously been dismissed, the settlement agreement between Plaintiffs and John Doe 1 expressly providing that it does not release those claims.

Pursuant to *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), this stipulation of dismissal explicitly reserves jurisdiction in this Court to enforce the terms of the settlement agreement between Plaintiffs and Defendant John Doe 1. Plaintiffs and Defendant John Doe 1 agree that the Court retains jurisdiction and authority to enforce, and resolve any disputes concerning, their settlement agreement, as more fully described in the settlement agreement.

Dated: March 25, 2025

Respectfully submitted,

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